

Joseph E. Saracheck (Bar # 2163228)
SARACHEK LAW FIRM
670 White Plains Rd. - Penthouse
Scarsdale, New York 10583
Telephone: (646) 403-9775
Facsimile: (646) 861-4950

*Counsel to BFaller RD LLC, BFaller
ROTH RD LLC, SFaller TRD RD LLC,
and SFaller RD LLC*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
CELSIUS NETWORK LLC, et al., ¹) Case No. 22-10964 (MG)
Debtors.) (Jointly Administered)

**NOTICE OF MOTION SEEKING ENTRY OF AN ORDER FOR A RULE 2004
EXAMINATION (Docket No. 4866)**

¹ The Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC's principal place of business and the Post-Effective Date Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

PLEASE TAKE NOTICE that a hearing on the Motion of Corporate Creditors LAURA MCNEIL (representing her parents, SHERI FALLER and BERNARD JACOB FALLER) and WESLEY CHANG (“Examining Party”) Seeking Entry of an Order (I) for a Rule 2004 Examination (the “Motion”) will be held on **June 27, 2024, at 10:00 a.m., prevailing Eastern Time** (the “Hearing”) before the Honorable Martin Glenn, Chief United States Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that the Examining Party will conduct a Bankruptcy Rule 2004 Examination of PayPal and Coinbase (the “Witness”) and states: Examining Party seeks to examine the Witness under Fed. R. Bankr. P. 2004 and Local Rule 2004-

1. The examination will related to the acts, conducts, or property or to the liabilities and financial condition of the Debtor, or to any matter which may affect the administration of the Debtor’s estate, or to the Debtor’s right to a discharge. The Examining Party will examine (I) the time at which the Post-Effective Date Debtors learned the original banking partner’s financial condition was uncertain, in addition to documentation with dates showing Post-Effective Date Debtors actions; (II) List of sold cryptocurrency transactions for the 1,700 Corporate Creditors chosen to receive US Dollar distributions; (III) efforts to seek out Distribution Partners (other than Coinbase) capable of distributing cryptocurrency to more Corporate Creditors and (IV) Correspondence between the Post-Effective Date Debtors and Coinbase related to the distribution agreement for Corporate Accounts. The scope of the examination is presented as in **Exhibit A** (“Motion for Discovery”).

PLEASE TAKE FURTHER NOTICE that the examination of the Witness will occur at **July 11, 2024, at 10:00 a.m., prevailing Eastern Time** at the office of **Saracheck Law Firm, 670 White Plains Rd, FL PH, Scarsdale, NY 10583**.

PLEASE TAKE FURTHER NOTICE that any objections to a Rule 2004 Examination Requested in the Motion shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of *In re Celsius Network LLC*, No. 22-10964 (MG) by registered users of the Court's electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court's website at <http://www.nysb.uscourts.gov>); and (d) be served in accordance with the *Second Amended Final Order (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Granting Related Relief* [Docket No. 2560] (the "Case Management Order") by **June 24, 2024, at 4:00p.m., prevailing Eastern Time**, to (i) the entities on the Master Service List (as defined in the Case Management Order and available on the case website of the Post-Effective Date Debtors at <https://cases.stretto.com/celsius>) and (ii) any person or entity with a particularized interest in the subject matter of the Motion.

PLEASE TAKE FURTHER NOTICE that copies of all pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Celsius>. You may also obtain copies of the motions and other pleadings filed in these chapter 11 cases by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Scarsdale, New York
Dated: June 7, 2024

/s/ Joseph E. Saracheck
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Scarsdale, New York 10583
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670 White Plains Rd, Fl. PH, Scarsdale, NY 10583 | P: (646) 517-5420